08-13555-mg Doc 17536 Filed 06/08/11 Entered 06/08/11 19:47:46 Main Document Pg 1 of 2

Hearing Date and Time: June 15, 2011 at 10:00 a.m. (Prevailing Eastern Time) Objection Date and Time: June 8, 2011 at 4:00 p.m. (Prevailing Eastern Time)

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

Kenneth S. Ziman Four Times Square

New York, NY 10036 Phone: (212) 735-3000

Fax: (212) 735-2000

Attorneys for Och-Ziff Capital Management Group LLC

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11 : LEHMAN BROTHERS HOLDINGS INC., et al., : Case No. 08-13555 (JMP) : Debtors. : (Jointly Administered) :

OBJECTION OF OCH-ZIFF CAPITAL MANAGEMENT GROUP LLC TO THE MOTION OF THE AD HOC GROUP OF LEHMAN BROTHERS CREDITORS PURSUANT TO SECTIONS 105(A) AND 1109(B) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2019 AND 7026 TO ESTABLISH DISCLOSURE PROCEDURES

Och-Ziff Capital Management Group LLC ("Och-Ziff"), by and through its undersigned attorneys, hereby submits this objection to the Motion of the Ad Hoc Group of Lehman Brothers Creditors Pursuant To Sections 105(a) and 1109(b) of the Bankruptcy Code and Bankruptcy Rules 2019 and 7026 To Establish Disclosure Procedures (the "Motion") in the above-captioned chapter 11 cases of Lehman Brothers Holdings Inc. and its affiliated debtors-in-possession (together, the "Debtors"), and in support thereof respectfully represents as follows:

1. On September 15, 2008 and periodically thereafter, Lehman Brothers Holdings
Inc. and its affiliated debtors-in-possession commenced voluntary cases (the "Chapter 11 Cases")
under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United
States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court").

08-13555-mg Doc 17536 Filed 06/08/11 Entered 06/08/11 19:47:46 Main Document Pq 2 of 2

2. Investment funds affiliated with Och-Ziff are creditors of several of the Debtors.

3. On May 23, 2011, the Ad Hoc Group of Lehman Brothers Creditors filed the

Motion in the Chapter 11 Cases. The Motion, under the guise of § 105 of the Bankruptcy Code,

purports to impose disclosure obligations on parties in the Chapter 11 Cases that go beyond those

required by either current Rule 2019 of the Federal Rules of Bankruptcy Procedures (the

"Bankruptcy Rules") or those contemplated by amended Rule 2019.

4. Och-Ziff has reviewed several of the objections filed in response to the Motion.

For the reasons set forth in those objections, Och-Ziff also objects to the relief requested in the

Motion as being inconsistent with the Bankruptcy Code and Bankruptcy Rules and respectfully

submits that the Motion should be denied.

Dated: New York, New York June 8, 2011

Respectfully submitted,

Skadden, Arps, Slate, Meagher & Flom LLP

By: /s/ Kenneth S. Ziman

Kenneth S. Ziman

Four Times Square

New York, New York 10036

Telephone: 212-735-3000 Facsimile: 212-735-2000

Attorneys for Och-Ziff Capital Management

Group LLC